

UNITED STATES BANKRUPTCY COURT Chapter 11 Case No. 22-10964 (MG)
SOUTHERN DISTRICT OF NEW YORK (Jointly Administered)

In re CELSIUS NETWORK LLC, *et al*¹,

DANIEL A. FRISHBERGS' RESERVATION OF RIGHTS

As I have a direct interest in these matters, **I reserve any and all rights**, including but not limited to the ones listed below. While I would hope that this reservation of rights is not necessary, time and time again it has been shown that it is.

I reserve any and all rights to file motions, objections, requests for relief, requests for injunctions and injunctive relief, appeal decisions both to this court and other courts such as appeal courts, and seek to sanction the UCC counsel (and anyone else) if they attempt to maliciously sanction me for exercising my due process rights. **I reserve any and all rights granted to me under the constitution, in common law, and any other commonly cited sources such as the *Magna Carta***.

I reserve all rights as a party-in-interest with respect to the property rights status of Earn customer deposits (which is the type that I have been wrongly classified), and any other rights that I have. **I reserve all procedural and substantive rights with respect to any process to determine the property status of Earn customer deposits and, specifically, to my deposits.** I

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Celsius Network LLC (2148); Celsius KeyFi LLC (4414); Celsius Lending LLC (8417); Celsius Mining LLC (1387); Celsius Network Inc. (1219); Celsius Network Limited (8554); Celsius Networks Lending LLC (3390); and Celsius US Holding LLC (7956). The location of Debtor Celsius Network LLC's principal place of business and the Debtors' service address in these chapter 11 cases is 121 River Street, PH05, Hoboken, New Jersey 07030.

request that I be included in any further status conferences and other conversations, written or telephonic, related to Earn customer property rights and **my property rights that may impact any of my future claims**, consistent with Local Rules and the Bankruptcy Code. I do not consent to any stipulations between the Debtor or other parties to determine the property rights of my deposits on my behalf, nor do I consent to any stipulations between the Debtors, or any other parties, to determine anything that will affect my assets, or my rights. I do not consent to any procedural relief for the Debtor on **any matter** that may impact my rights to assert my own property rights without either my explicit consent, or a court order authorizing such relief, and an opportunity for me to respond to any such request for relief.

I do **not** consent to filings under seal or motions to shorten time, on this matter, **or any matter**, without my explicit consent *or* a court order allowing for such actions. I do **not** consent to any final determination or stipulation on which issues must be adjudicated to resolve property of the estate issues around Earn deposits without a chance to respond to such a determination or stipulation **on a reasonable timeline**, and the Debtor, and the UCC should expect me to object to any stipulation or proposed order that violates any of my procedural or substantive rights; therefore, I would encourage them to attempt to talk to me at the front end versus resolving everything via the court, or submitting eleventh-hour proposed orders or stipulations that I have not reviewed and approved.

I consent to literally nothing, unless otherwise explicitly stated, and reserve literally any and all rights, especially ones that I do not know exist.

Respectfully submitted,

/s/Daniel A. Frishberg

November 14th, 2022